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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISAAC COLE,

Defendant.

CR 16-270 JCC

INFORMATION

The United States Attorney charges that:

**COUNT 1**  
**(Use of a False Document)**

On or about January 30, 2016, at Kent, within the Western District of Washington, and elsewhere, ISAAC COLE did willfully and knowingly make and cause to be made, and used, and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing and document, knowing the same to contain a materially false, fictitious and fraudulent statement. Specifically, ISAAC COLE, in a matter within the jurisdiction of the United States Environmental Protection Agency, caused the creation, and submission to the Washington State Department of Labor and Industries of a Certified Asbestos Supervisor Application certifying that B.E., an asbestos supervisor practicing in Washington, had completed an approved asbestos training course

INFORMATION/COLE- 1

UNITED STATES ATTORNEY  
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1 as required by the Asbestos Hazard Emergency Response Act ("AHERA"), 15 U.S.C.  
2 § 2641 *et seq*, when, as defendant well knew, B.E. had not attended such a training  
3 course.

4 All in violation of Title 18, United States Code, Section 1001(a)(3) and Title 18,  
5 United States Code, Section 2.

6  
7 **COUNT 2**  
8 **(Violation of the Toxic Substances Control Act)**

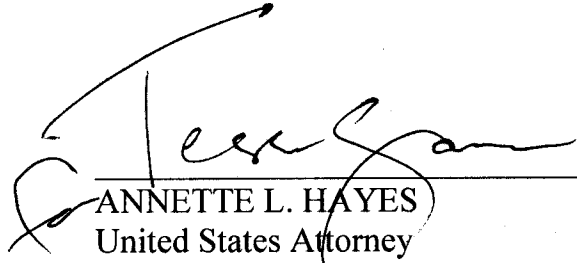
9 On or about January 30, 2016, at Kent, within the Western District of Washington,  
10 and elsewhere, ISAAC COLE did knowingly and willfully fail and refuse to comply  
11 with, and caused the failure and refusal to comply with, a rule promulgated under  
12 Subchapter II of the Toxic Substances Control Act, specifically 40 C.F.R. Part 763,  
13 Subpart E, Appendix C, Sections I B-D, in that defendant caused to be issued to the  
14 Washington State Department of Labor and Industries a Certified Asbestos Supervisor  
15 Application certifying that B.E., an asbestos supervisor practicing in Washington, had  
16 completed an eight-hour continuing education course, when, in fact, B.E. had failed to  
17 undergo this training.

18 //


19 //

1 All in violation of Title 15, United States Code Sections 2615(b)(1), 2614, and  
2 2646, and Title 18, United States Code, Section 2.  
3

4 DATED: October 11, 2016  
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8 ANNETTE L. HAYES  
9 United States Attorney

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12 ANDREW FRIEDMAN  
13 Assistant United States Attorney

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16 SETH WILKINSON  
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